



**VIEWS OF NOIDA SOFTWARE TECHNOLOGY PARK LTD (NSTPL), NEW DELHI TO THE DRAFT TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES (FOURTH) (ADDRESSABLE SYSTEMS) TARIFF (AMENDMENT) ORDER, 2015 DATED 30.09.2015 OF TELECOM REGULATORY AUTHORITY OF INDIA.**

NSTPL takes this opportunity to thank the Telecom Regulatory Authority of India for providing an opportunity to the stakeholders' to offer their views/suggestions on the aforesaid draft Tariff Order.

The comments of NSTPL to the draft Tariff Order are as under:

NSTPL, prima facie, accept and agreed with the twin conditions formulated by TRAI.

The applicability of the twin condition proposed by Hon'ble Authority can really make a impact on the market only and only if the pricing of bouquet shall be linked to actual price of channels (i.e. rates on which agreement is executed between service providers) instead of the wholesale price (i.e. RIO rate as at present) of the channels. In the current market scenario, there is a huge difference between the wholesale prices of the channels and actual price on which the agreements are executed. Further, the lowest rate of channels at the wholesale level is the only way to make the packaging more attractive and affordable for end consumers. Hence, this huge difference between the pricing of channels is leading to market distortion and creating insecurity against pricing of channels amongst the service providers.

Aside to this, it would be more meaningful to introduce such conditions if the agreements executed between the service providers shall be made in order of provisions of standard Interconnection Agreements i.e. RIO.

The definition of RIO proposed by TRAI is as under:

**“(zba) “RIO” means a Reference Interconnect Offer published by a service provider specifying terms and conditions on which other service providers may seek interconnection from the service provider making the offer;**

NSTPL's suggestion on the proposed definition of RIO is as under:

***“(zba) “RIO” means a Reference Interconnect Offer specifying all the terms and conditions published by a service provider out of which only, other service providers may seek interconnection from the service provider making the offer;***

**Explanation:** RIO published by a service provider must also includes all the offers (including discounts etc.) on which the service provider has signed or going to sign with other service providers in future atleast for six months. There should not be any signed agreement on other terms & conditions other than mentioned in RIO published by the service provider.